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**From:** Weigert, David (ENRD) [David.Weigert@usdoj.gov]  
**Sent:** 5/1/2017 9:56:14 PM  
**To:** Michael A. Leon [MLEon@nutter.com]  
**CC:** Chin, William [chin.bill@epa.gov]; Olivier, Tom [olivier.tom@epa.gov]; Spina, Providence [Spina.Providence@epa.gov]; Engel, Bethany (ENRD) [Bethany.Engel@usdoj.gov]  
**Subject:** Global: Settlement Term Sheet w/ Civil Penalty  
**Attachments:** ENV\_ENFORCEMENT-#2658581-v1-Term\_Sheet\_(global).PDF

**Importance:** High

***Confidential; For Settlement Purposes Only; Subject to Fed. R. Evid. 408***

Michael,

Following up on our March 30 settlement meeting, I am attaching a revised settlement term sheet adding a proposed amount for the settlement of the United States' civil penalty claim related to Global's South Portland, ME, facility. Except for the penalty, the term sheet is identical to the initial version we sent you in March.

As always, the proposed terms are subject to review and approval by appropriate federal management officials. Also, per our March 30 discussion, we ask that Global, Global's contractors, and you treat the term sheet (all versions) and this email, including the information contained therein, as confidential, for settlement purposes, and not for release to Sprague or any other person.

Please note that EPA calculated the proposed civil penalty, including standard economic benefit and gravity components, in accordance with EPA's national Clean Air Act Stationary Source Civil Penalty Policy. See <https://www.epa.gov/enforcement/clean-air-act-stationary-source-civil-penalty-policy-october-25-1991>.

Please respond to our settlement proposal, reflected in the revised term sheet, as soon as possible, but no later than **May 10, 2017**. Once the parties agree on key terms (subject to federal management approval), we will draft and send you a conforming proposed consent decree.

Thanks.  
David

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